

# **EXHIBIT “A”**

Pam Schreiner depo (AZ) Powers 05-25-05  
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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

SAMUEL E. POWERS, a married man,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	NO. CV2003-013457
	)	
TASER INTERNATIONAL, INC., a	)	
Delaware corporation,	)	
	)	
Defendant.	)	
_____	)	

VIDEOTAPED DEPOSITION OF PAM SCHREINER

Phoenix, Arizona  
May 25, 2005  
9:04 a.m.

Prepared For:  
  
SUPERIOR COURT  
  
MARICOPA COUNTY  
  
(ORIGINAL)

Prepared By:  
  
SHELLEY HAVERMANN, RPR, CCR  
Certification, No. 50432  
Bartelt & Kenyon  
101 N. First Ave., Ste. 2450  
Phoenix, Arizona 85003

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2 commenced at 9:04 a.m., on May 25, 2005, at  
3 the law offices of DILLINGHAM & REYNOLDS, LLP, 5080  
4 North 40th Street, Suite 335, Phoenix, Arizona, before  
5 SHELLEY HAVERMANN, a Certified Court Reporter in and  
6 for the County of Maricopa, State of Arizona.

7 \* \* \*

8  
9 A P P E A R A N C E S

10 For the Plaintiffs:

11 DILLINGHAM & REYNOLDS, LLP  
12 By: John L. Dillingham, Esq.  
13 5080 North 40th Street, Suite 335  
Phoenix, Arizona 85018

14 THOMAS C. WILMER, P.C.  
15 By: Thomas C. Wilmer, Esq.  
16 2504 North Third Street  
Phoenix, Arizona 85004

17 For the Defendants:

18 RENAUD, COOK, DRURY, MESAROS, PA  
19 By: Christina J. Reid-Moore, Esq.  
20 One North Central Avenue, Suite 900  
Phoenix, Arizona 85004

21 Also present: Brent Jensen, K-Video  
22  
23  
24  
25

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4

1 STIPULATION

2 IT IS STIPULATED by and between counsel for the  
3 respective parties hereto that the deposition of

4 PAM SCHREINER  
Page 3

5 may be taken on oral interrogatories before  
6 SHELLEY HAVERMANN, a court reporter and Notary Public  
7 in and for the County of Maricopa, State of Arizona.

8 IT IS FURTHER STIPULATED that the deposition is  
9 taken pursuant to the Rules of Civil Procedure relating  
10 to the taking and returning of depositions for use in  
11 the Superior Court of Arizona, County of Maricopa; that  
12 the witness waived reading and signing said deposition;  
13 and that notice of filing and other formalities  
14 required by law for the taking and returning of said  
15 deposition are waived.

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
  
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5

1 Phoenix, Arizona  
2 May 25, 2005  
3 9:04 a.m.

4 \* \* \*

5 THE VIDEOGRAPHER: To comply with  
6 Arizona Rule 28, it is agreeable by all parties that  
7 the videographer read the introduction, conclusion, and  
retain all videotapes or so state an objection now.

8 My name is Brent Jensen, legal video  
9 specialist with K-Video Productions. Our court  
10 reporter is Shelley Havermann, representing Bartelt &  
11 Kenyon at 101 North First Avenue, Phoenix, Arizona.

12 We are at the law offices of  
13 Dillingham & Reynolds, 5080 North 40th Street, Phoenix,  
14 Arizona, to take the deposition of Pam Schreiner on  
15 behalf of the plaintiff in the Superior Court of  
16 Arizona, Maricopa County case of Powers versus  
17 Taser International, Incorporated, Case Number  
18 CV 2003-013457.

19 The date is May 25th, 2005, and the  
20 time is 9:04 a.m. The attorneys will now introduce  
21 themselves, plaintiffs first, please.

22 MR. DILLINGHAM: John Dillingham and  
23 Tom Wilmer for the plaintiff.

24 MS. REID-MOORE: Christina Reid-Moore for  
25 Taser International.

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6

1 THE VIDEOGRAPHER: Please swear in the  
2 witness.

3 \* \* \*

4 PAM SCHREINER,  
5 called as a witness herein, having been first duly  
6 sworn, was examined and testified as follows:

7 \* \* \*

8 EXAMINATION

9 BY MR. DILLINGHAM:

10 Q. Good morning.  
Page 5

- 11 A. Good morning.
- 12 Q. Would you please tell us your name.
- 13 A. Pam Schreiner.
- 14 Q. And, Pam, where do you live?
- 15 A. I live at 3731 East Renee Drive, Phoenix,
- 16 Arizona.
- 17 Q. Okay. Pam, have you ever had your
- 18 deposition taken before?
- 19 A. No.
- 20 Q. Okay. I'm going to take a couple of
- 21 minutes to explain to you the process and make sure you
- 22 understand the process before we start asking you some
- 23 questions. Okay?
- 24 A. Okay.
- 25 Q. First of all, you do understand that

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- 1 you're under oath just as you would be if you were
- 2 testifying in court?
- 3 A. Yes.
- 4 Q. Okay. Because of the nature of a
- 5 deposition, even though you can see you're being video
- 6 recorded, you're also being transcribed as is everybody
- 7 in this room. The court reporter is taking down a
- 8 verbatim transcript of everything we say in addition to
- 9 the fact that the matter is being videoed. And
- 10 because of that, it's important that we follow certain
- 11 rules of communication to make sure the court reporter
- 12 can have a clear record. Okay?
- 13 A. Yes.

14 Q. You have to give verbal responses to  
15 questions. Uh-huhs, huh-uhs, nods and shakes of the  
16 head make it very difficult to keep a clear record.  
17 okay?

18 A. Yes.

19 Q. One of the biggest problems that lawyers  
20 and witnesses have is talking over one another. There  
21 will be many times when you will anticipate my question  
22 before I've finished asking it. Please wait until I've  
23 finished asking it until you give your answer. Okay?

24 A. Yes.

25 Q. If you don't understand a question that

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1 I've asked you, tell me you don't understand it and  
2 I'll rephrase it to make sure you do. All right?

3 A. Okay.

4 Q. If you answer my question, I will assume  
5 that you've heard it and that you've understood it.  
6 okay?

7 A. Yes.

8 Q. If at any time you want to take a break,  
9 if you need more water, something to drink, you want to  
10 go to the rest room, anything like that, just let us  
11 know. The only caveat to that is not right in the  
12 middle of a question. As soon as the answer is done,  
13 then if you want to take a break, just let us know.  
14 okay?

15 A. Okay.

16 Q. All right.

17 A. Yes.  
18 Q. Where do you work currently?  
19 A. I work at Quality Building Maintenance.  
20 Q. Okay. And what do you do there?  
21 A. I'm the office manager.  
22 Q. Okay. Now, it's my understanding that at  
23 some point you did work for Taser International.  
24 A. Yes.  
25 Q. When were you hired by Taser

1 International?  
2 A. March 8th of 2004.  
3 Q. And how did your relationship with Taser  
4 begin? In other words, did you respond to an ad? Did  
5 somebody call you? How did you get hooked up with  
6 them?  
7 A. I actually responded to an ad that I had  
8 seen on one of the Internet job sites.  
9 Q. Okay. What was the ad for?  
10 A. It was for an executive assistant.  
11 Q. Okay. And did you call up and ask to  
12 submit an application?  
13 A. No. I actually submitted the application  
14 online.  
15 Q. Okay. And then what happened next?  
16 A. I received a phone call from the human  
17 resource manager, Marcy Rigoni. She just had given me  
18 a few questions to see if I would be qualified for the  
19 position. And then it moved to the second phase of an

20 interview with Kate Sinclair, and I believe it was with  
21 Kate Sinclair and Marcy Rigoni.

22 Q. Okay. Had you known anybody at Taser  
23 International before you responded to the ad?

24 A. No, sir.

25 Q. Did you know anything about what the

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10

1 company did?

2 A. No.

3 Q. Okay. And I assume you went to the  
4 interview?

5 A. Yes.

6 Q. Did anybody else participate in the  
7 interview other than Kate and Marcy?

8 A. Not at the first interview, no.

9 Q. Was there a second interview?

10 A. Yes.

11 Q. And who was the second interview with?

12 A. The second interview was with

13 Kate Sinclair, Rick Smith and Doug Klint.

14 Q. Okay. What type of questions were asked  
15 of you during that interview?

16 A. Basic questions, you know, my skill sets,  
17 what I was familiar with doing, how I handled stress,  
18 things that would, you know, normally come up in an  
19 interview.

20 Q. And did they describe to you in a little  
21 more detail at the second interview what your specific  
22 duties and responsibilities would be?

23           A.    Not really.  They did specify that, you  
24   know, percentagewise it would be, you know, 50 percent  
25   legal, 20 percent just general clerical type things.

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1   And the rest of it would be your, you know, executive  
2   assistant type admin role.

3           Q.    Did they explain who you would primarily  
4   be working for?

5           A.    Yes.

6           Q.    And who was that?

7           A.    It would be Rick Smith, Phil Smith and  
8   Doug Klint.

9           Q.    Phil Smith?

10          A.    Phil Smith, yes.

11          Q.    What about Tom Smith?

12          A.    No.

13          Q.    When they talked to you about the  
14   50 percent portion of your job that would be involved  
15   in legal, did they get any more specific as to what  
16   that entailed?

17          A.    No.  Basically, it would be doing --  
18   creating files, you know, basically opening up legal  
19   files and, also, basically helping the attorney with  
20   any matters that would come before him, such as, you  
21   know, speaking with attorneys, setting up appointments,  
22   things of that nature.

23          Q.    Okay.  Did they enlighten you on what  
24   their business was, what they did, and what was going  
25   on?

1           A.    I actually asked the question at the  
2 first interview, what Taser was really about, because I  
3 did some research on my own and -- because I honestly  
4 didn't know anything about them. So I conducted my own  
5 research to find out more about the company.

6                   And we did go into a little bit more  
7 detail. You know, I wanted to see where they saw  
8 themselves in the future, how, you know, big they were  
9 planning on getting, you know, things of that nature,  
10 and so we did discuss that.

11           Q.   And was that discussed with Mr. Klint and  
12 Mr. Smith at the second interview?

13           A.   Yes.

14           Q.   Okay. What did they tell you about the  
15 business?

16           A.   Basically they saw that the company was  
17 going to grow and they felt that it was something that  
18 they, you know, in the future thought that they were  
19 going to be a huge company. And they were looking at  
20 other avenues of things that they wanted to get into as  
21 far as --

22           Q.   Did they explain --

23           A.   No. They didn't go into specifics with  
24 me.

25           Q.   Okay. And did you in fact get hired

1 after that second interview?

2 A. Yes.

3 Q. And who notified you that you had been  
4 hired for the position?

5 A. Rick Smith.

6 Q. And your first day of work there was  
7 March --

8 A. I think it was March 8th. It was a  
9 Monday.

10 Q. of 2004?

11 A. Yes.

12 Q. Okay. At any time did you have a written  
13 employment agreement?

14 A. Yes.

15 Q. Okay. And did that written employment  
16 agreement provide for compensation?

17 A. Yes.

18 Q. And was it a fixed fee amount of  
19 compensation?

20 A. Yes. It was a salary amount.

21 Q. Okay. Was there any bonus provisions?

22 A. There were stock options.

23 Q. Okay. Do you remember what your stock  
24 options were?

25 A. I -- no, I don't. I'm sorry, I don't.

1 Q. Did you ever get a chance to exercise any  
2 of those stock options?

3 A. No.

4 Q. Okay. What I'm going to do is I'm going  
5 to go to the other end now of your employment with  
6 Taser.

7 A. Okay.

8 Q. And then we'll fill in the middle later.

9 A. Okay.

10 Q. It's my understanding that at some point  
11 in time you no longer were employed by Taser?

12 A. Yes, that's correct.

13 Q. When was that? When were you no longer  
14 employed?

15 A. January 27th of 2005.

16 Q. Okay. And can you explain the  
17 circumstances that led to the fact that you were no  
18 longer employed?

19 A. There was an internal investigation being  
20 handled through the company. And they are alleging  
21 that I falsified information during an investigation.

22 Q. Were the allegations true?

23 A. No.

24 Q. Who told you at Taser that you were being  
25 accused of falsifying information during an

1 investigation?

2 A. Nobody verbally told me. I received a  
3 letter.

4 Q. Who was the letter signed by?

5 A. Tom Smith. There were actually two

6 Pam Schreiner depo (AZ) Powers 05-25-05  
7 letters, I apologize. There were actually two letters.  
8 One was signed by Marcy Rigoni and one was signed by  
9 Tom Smith.

10 Q. Did you get them both the same day?

11 A. Yes.

12 Q. Before the day you received the letter,  
13 had anybody ever talked to you about this topic?

14 A. Yes.

15 Q. Who?

16 A. I was investigated by Chandler Police  
17 Department in three different interviews.

18 Q. Do you remember the name of the officers?

19 A. I only know their first names and that  
20 was Burt and Tim, I believe.

21 Q. How long before you got these letters  
22 from Tom and Marcy did you have the discussions with  
23 Burt and Tim?

24 A. There was an interview on the -- it was  
25 Monday the -- I guess it would have been the 24th,  
January 24th. It was a Monday. And I was -- on that

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1 day, I was put on administrative leave for two days.

2 I was called by Doug Klint on Wednesday  
3 to come into the office on Monday -- or on Thursday  
4 morning, which was the 27th at 9:30, and they would  
5 discuss my employment further.

6 I went to the office. I spoke to  
7 Marcy Rigoni. And I was told to sit in her office, and  
8 at that point, I believe that it was Burt came and got

9 Pam Schreiner depo (AZ) Powers 05-25-05  
10 me, and we had to go to another off-site location, and,  
11 basically, had another interview with them, which was  
12 about an hour, hour and a half.

13 And at that point, I was asked to write a  
14 letter of resignation, which I did, and I turned in all  
15 my personal belongings -- oh, well, my Taser  
16 belongings, I should say. I'm sorry.

17 Q. Okay. What was the specific information  
18 they were accusing you of falsifying?

19 A. Opening a letter. There were two  
20 different letters that came in from a government  
21 agency, and I got my dates screwed up and, also, you  
22 know, it was an honest mistake. I just -- there were  
23 two envelopes. One was opened, one was not, and I got  
24 them confused. And that's what I told them, and that's  
25 what they're alleging, I'm assuming.

Q. Who was the letter from that you opened?

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1 A. It was the Securities Exchange  
2 Commission.

3 Q. Did you read the letter?

4 A. I saw the letter because it wasn't  
5 addressed. I didn't know what it was, so I, you know,  
6 needed to see what it was so that I could give it to  
7 the appropriate person.

8 Q. When -- what was the date of this letter,  
9 approximately?

10 A. I truly don't remember.

11 Q. Do you remember what month it was?

12 A. It would have been probably late  
13 December.  
14 Q. How did they find out, to your knowledge,  
15 that you opened it?  
16 A. I actual --  
17 MS. REID-MOORE: Form, foundation.  
18 Q. BY MR. DILLINGHAM: Go ahead.  
19 THE WITNESS: Is it okay to answer?  
20 MS. REID-MOORE: Yes. Go ahead.  
21 THE WITNESS: Okay. I'm sorry. I  
22 actually gave the letter to Tom Smith, and said to him  
23 that this letter came through the mail, and that was  
24 the first letter that was received. I gave it to Tom  
25 and I said, you know, this letter was received. I

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1 didn't want to just leave it out for anybody, and, you  
2 know, if there's anything I could do to help him with  
3 that, just to let me know. And that was the last I  
4 seen the letter.  
5 And a short time after that, I would say  
6 within a week or two, another letter came through,  
7 which was not addressed to anybody, and it was opened  
8 and given to me, and I gave that letter to Doug Klint.  
9 Q. BY MR. DILLINGHAM: Okay. So as I  
10 understand it, your indiscretion that they were  
11 accusing you of had to do with opening these letters?  
12 A. That's what I was thinking, because  
13 there's nothing else that I would have known about.  
14 I -- there was -- you know, they'd asked me about that

15 Pam Schreiner depo (AZ) Powers 05-25-05  
16 and also some purchase order that was faxed in. And I  
17 guess there was something -- something wrong with the  
18 purchase order, but I don't deal with purchase orders  
or did not deal with purchase orders.

19 Q. What -- when we first started talking  
20 about this, you indicated to me that they had accused  
21 you of falsifying information during the investigation.

22 A. Uh-huh.

23 Q. What you've --

24 A. The only --

25 Q. What you've told me so far --

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1 A. Oh, I'm sorry.

2 Q. -- relates to opening a letter that maybe  
3 in hindsight you shouldn't have opened, but how does  
4 that relate to falsifying information?

5 A. Because I gave -- they had asked me  
6 if I had opened any envelopes and if I had seen the  
7 letter, and I told them at the time that I had  
8 knowledge, you know, that these letters were there.

9 I confused the two envelopes, because one  
10 was opened and one was not. And the only thing I had  
11 told them was that the first letter that was received  
12 was not opened, and, you know, vice versa.

13 And they're claiming that that was  
14 falsified because I confused dates and I confused  
15 letters that were opened or not opened. And that's  
16 what they're alleging. That's the only thing that we  
17 really talked about in the interviews.

18 Pam Schreiner depo (AZ) Powers 05-25-05  
Q. Did they ever explain to you how that  
19 type of mistake --  
20 A. No, sir.  
21 Q. Let me -- I know you know where I'm  
22 going.  
23 A. I know.  
24 Q. Did they ever explain to you why that  
25 type of mistake they felt warranted termination?

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1 MS. REID-MOORE: Form.  
2 THE WITNESS: No.  
3 Q. BY MR. DILLINGHAM: Did you ask anybody  
4 that?  
5 A. I was not allowed to talk to anybody.  
6 Q. So from the time you began talking to the  
7 Chandler Police Department, Burt and Tim --  
8 A. Uh-huh.  
9 Q. -- you were never given the opportunity  
10 to talk to anybody directly at Taser; is that right?  
11 A. Correct.  
12 Q. You never talked to Doug Klint,  
13 Tim Smith -- Tom Smith, Rick Smith or Phillip Smith?  
14 A. No.  
15 Q. Okay.  
16 A. I was told not to talk to them.  
17 Q. Did you request an opportunity to talk to  
18 them?  
19 A. Yes.  
20 Q. Who did you request the opportunity to

21 Pam Schreiner depo (AZ) Powers 05-25-05  
21 talk to them with?

22 A. Marcy Rigoni who was the human resource  
23 manager.

24 Q. Okay. Did you at any time think there  
25 must be some other reason that they're trying to

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21

1 terminate you?

2 MS. REID-MOORE: Foundation.

3 THE WITNESS: Yeah.

4 MS. REID-MOORE: Go ahead.

5 THE WITNESS: Yes.

6 Q. BY MR. DILLINGHAM: What was the reason  
7 you thought they were trying to terminate you?

8 A. Well, I -- honestly I didn't know. I  
9 mean, I thought, you know, if it was something, you  
10 know, that I had done wrong, the least they could have  
11 done was told me, you know, given me warning or, you  
12 know, done something so that I had a chance to correct  
13 whatever it is that I did wrong.

14 And, you know, in my opinion, I didn't do  
15 anything because I, you know, I enjoyed working at  
16 Taser, I enjoyed working with the people at Taser. And  
17 I just -- it kind of hit me blind-sided. I truly -- I  
18 was just -- I was very upset. It was a very emotional  
19 time for me because I truly did not know what was  
20 happening or why it was that they let me go.

21 Q. Okay. Have you talked to anybody at  
22 Taser since January 27th, 2005?

23 A. No.

24 Pam Schreiner depo (AZ) Powers 05-25-05  
Q. Have you talked to Taser's counsel in  
25 this case since January 27th, 2005? without telling me

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22

1 what you said, just tell me, have you talked to them,  
2 anybody that you understand was representing Taser?

3 A. Yes.

4 Q. Who have you talked to?

5 A. Tina Moore.

6 Q. When was the last time you talked to her?

7 A. It was probably two weeks ago.

8 Q. How long was the conversation?

9 A. Just a few minutes.

10 Q. Okay. Did she give you any legal advice  
11 during that conversation?

12 A. No, sir.

13 Q. Okay. What was discussed?

14 A. Basically that -- just to prepare me to  
15 know that I was going to be possibly subpoenaed for a  
16 deposition.

17 Q. Okay. Had you talked to Ms. Moore at any  
18 time before that and after your termination?

19 A. No.

20 Q. Have you talked to any other attorneys  
21 that you understood were representing Taser since your  
22 termination on January 27th, 2005?

23 A. In reference to Taser? I mean, as far as  
24 that would represent Taser?

25 Q. Yes.

1 A. No.

2 Q. Okay. Let's talk a little bit about  
3 what you actually did once you started working there.

4 A. Okay.

5 Q. Can you describe to me a typical day for  
6 you once you started working there in March of 2004.

7 A. Well, my typical day would be, you know,  
8 I'd come in in the morning and, you know, prepare my  
9 day. I would, you know, see what was on the agenda to  
10 make sure that calendaring was done for Rick or  
11 Phil or, you know, Doug.

12 I also started to help out a little bit  
13 more with expense things for Dave Dubay, Ray Rivera,  
14 Tom Smith, if need be. And I would also work on any  
15 legal files that were there as far as discovery goes on  
16 any of the legal cases.

17 Q. Had you ever done that before in any  
18 other prior employment, worked on legal files?

19 A. Yes.

20 Q. Where had you done that before?

21 A. I worked at a law firm in Phoenix.

22 Q. Which law firm?

23 A. Parker Stanbury.

24 Q. How long did you work there?

25 A. About two and a half years, almost three.

1 Q. And what did you do at that law firm?

2 A. I was the legal administrator.

3 Q. What does that mean, legal  
4 administrator?

5 A. I basically was the office manager. I  
6 was the point person for everything in the office.

7 Q. Okay. When you say you worked on legal  
8 files at Taser, what do you mean by that?

9 A. I would compile the discovery, as far as  
10 the information that needed to go to other counsel for  
11 discovery. If it was paperwork to show, you know, the  
12 safety of the weapon or, you know, things of that  
13 nature. I would also do the interrogatories as far as  
14 trying to answer the questions if I could.

15 I would basically work on things that  
16 would pertain to the particular case, if they needed,  
17 you know, if they needed copies of the autopsies, I  
18 would get them or, you know, information pertaining to  
19 that specific case.

20 Q. Okay. Approximately how many different  
21 cases would you estimate you worked on while you were  
22 at Taser?

23 A. I would say when I was there, there was  
24 probably, and I'm just guesstimating so, you know,  
25 don't hold me --

1 Q. Sure.

2 A. I'm guesstimating there were probably  
3 10.

4 Q. Okay. Did you work on any other cases  
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5 where litigation hadn't been filed but there had been  
6 some reports of injury that was in the works?

7 A. There --

8 MS. REID-MOORE: Form. Go ahead.

9 THE WITNESS: There was actually one case  
10 that I know of that we had received a letter on. And  
11 basically I was told to just hold off on it until we  
12 were, you know, served with actual paperwork.

13 Q. BY MR. DILLINGHAM: Do you remember what  
14 that -- name of that case, the name of the lawyer, the  
15 name of the --

16 A. No, I'm sorry, I do not.

17 Q. Does the name Tim Gungle ring a bell?

18 A. No.

19 Q. Who did you generally get your work  
20 assignments from while you were at Taser?

21 A. I -- well, I primarily would get the  
22 information to my desk first, and I would start working  
23 on it. And then I would go to Doug and have him assist  
24 me with, you know, tell me what I needed to do as far  
25 as, you know, do you want me to do this, do you want

1 me to do that, so primarily it would come from  
2 Doug Klint.

3 Q. Okay. Do you remember getting work  
4 assignments from anybody else other than Doug Klint  
5 while you were there?

6 A. You know, Rick would occasionally give me  
7 some things to do, or -- but nothing on the legal

8 side. So it would be, you know, the legal side would  
9 strictly be from Doug.

10 Q. Any other employees give you work  
11 assignments other than Doug Klint or Rick Smith?

12 A. No. Occasionally, I -- you know,  
13 someone may come and ask me, you know, can you help me  
14 out with this, as far as, you know, doing an expense  
15 report or I need copies of this or, you know, things of  
16 that nature.

17 Q. Can you give me the names of anybody in  
18 specific that may have asked you to help them in that  
19 regard?

20 A. Well, I would help out Mark Johnson. I  
21 would help Steve Tuttle, Ray Rivera, but, again, that  
22 was just expense reports. I would help -- you know, I  
23 would just -- I would help out everybody if I could. I  
24 tried to help out as much as I could anybody that  
25 needed help.

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1 Q. Did Jami Hill ever give you any work  
2 assignments?

3 A. No.

4 Q. Did you have an office that you actually  
5 called your own?

6 A. No, just a desk.

7 Q. And did your desk have a computer?

8 A. Yes.

9 Q. Was it your understanding that your  
10 computer was networked with other computers in the

11 office?

12 A. Yes.

13 Q. Okay. Do you remember the program that  
14 was involved that they used?

15 MS. REID-MOORE: Form. Go ahead.

16 THE WITNESS: It was Word and Excel. We  
17 had Outlook, Maximizer. I'm trying to think of the  
18 other programs that were there that -- those are the  
19 four main ones that were worked.

20 Q. BY MR. DILLINGHAM: Did you have to have  
21 a specific password or code to get into certain files?

22 A. I didn't, no.

23 Q. Did you have a password to get into your  
24 computer?

25 A. I had a password to get on my computer,

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1 yes.

2 Q. What was your password?

3 A. Oh, gee, I think it was -- I think it was  
4 Mikey 16. I don't remember. It was a while ago.

5 Q. Is that your son?

6 A. No. It was my husband.

7 Q. Okay. While you were employed at Taser,  
8 did you have any responsibility for maintaining any  
9 particular files for Doug Klint?

10 MS. REID-MOORE: Form.

11 THE WITNESS: Yes.

12 Q. BY MR. DILLINGHAM: What files did you  
13 have the responsibility for maintaining?

14 MS. REID-MOORE: Same objection. Go  
15 ahead.

16 THE WITNESS: It would be any of the case  
17 files that were ongoing, any new files that were coming  
18 in. Basically I handled the, you know, the files from  
19 the U.S. stock transfer, as far as -- and basically all  
20 I did there was file any information that came in to  
21 the company. I never actually created or, you know,  
22 did anything with them. I would just file them away  
23 for Doug. But primarily it was the legal cases that we  
24 had going on.

25 Q. BY MR. DILLINGHAM: Okay. What I want to

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1 do is I want to try to get you to think back and  
2 remember when you first started there.

3 A. Uh-huh.

4 Q. When you were first asked to help  
5 maintain these files.

6 A. Yes.

7 Q. When you first began looking at these  
8 litigation files, were there separate litigation files  
9 for each matter, or were all of the complaints of the  
10 lawsuits that had been received by Taser in one file?

11 MS. REID-MOORE: Object to form.

12 THE WITNESS: Yes. Everything was  
13 pretty much just in one big pile. There wasn't any  
14 system in place.

15 Q. BY MR. DILLINGHAM: Okay. Was it -- was  
16 there really a file or was it just loose documents?

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17 A. It was just loose documents.

18 Q. Where did you find the loose documents?

19 A. Pretty much everywhere. They were in the  
20 office, they were in the warehouse, they were, you  
21 know, production, above production. They were just  
22 everywhere. It wasn't just in one general area.

23 Q. How many different locations would you  
24 estimate you found some of this information?

25 A. At least --

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1 MS. REID-MOORE: Form. Go ahead.

2 Q. BY MR. DILLINGHAM: Go ahead.

3 A. At least five.

4 Q. Okay. Did it take you a while to try to  
5 put it all together?

6 A. Yes.

7 Q. How long?

8 A. Well, up until the end of my employment.  
9 I was still working on it as I -- before I left.

10 Q. Did you ever feel comfortable that you  
11 were able to gather all of the information that related  
12 to files or complaints that had been filed against  
13 Taser?

14 A. No.

15 MS. REID-MOORE: Form.

16 Pam, if I could just get my objection in  
17 before you answer.

18 THE WITNESS: I'm sorry. I'm sorry.

19 MS. REID-MOORE: That's okay.

20 Q. BY MR. DILLINGHAM: What did you do as  
21 you started gathering these complaints? And let's --  
22 before we go -- let me strike that. Let me make sure  
23 we're talking about the same thing.

24 You understand what a formal complaint is  
25 when a lawsuit has been filed based on your experience

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1 working at a law firm, right?

2 A. Yes.

3 Q. Okay. When you found these complaints in  
4 various locations, what did you physically do with  
5 them?

6 THE WITNESS: Can I go ahead?

7 MS. REID-MOORE: Sure.

8 THE WITNESS: Okay. I actually -- I went  
9 to Doug and said, you know, do we have files on these.  
10 I would try and figure out what was being done with  
11 them. Because there were, you know, dates on a set of  
12 issues. I mean, to me whenever there's a complaint,  
13 you know, if there's a date on it, you have a certain  
14 time frame, you know, to get the information to whoever  
15 you need to get it to.

16 And he just said --

17 MS. REID-MOORE: The only thing I want to  
18 do, John, is to the extent that Doug directed her on  
19 what to do with information, in other words, you get a  
20 complaint, you have to do something legally with it, I  
21 think we're getting close to --

22 MR. DILLINGHAM: No, no, no.

23 MS. REID-MOORE: I think we're getting  
24 close to legal advice.

25 MR. DILLINGHAM: We're getting close, but

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1 until we get into legal advice, I don't think we're  
2 there. I'll be careful and I'm sensitive to that  
3 issue.

4 Q. BY MR. DILLINGHAM: Okay Continue.

5 THE WITNESS: Okay?

6 MS. REID-MOORE: Well, go ahead. We'll  
7 go from -- go ahead.

8 THE WITNESS: Okay. Anyways, so I  
9 basically would just, you know, ask Doug, you know,  
10 where files were or whatever, and I was told to, you  
11 know, to work on getting files set up, because there  
12 was nothing in place.

13 Q. BY MR. DILLINGHAM: Okay. Did you begin  
14 to try to set up files?

15 A. Yes.

16 Q. When you set them up, how did you set  
17 them up?

18 A. Basically I was trying to go with a  
19 system that was used at the prior law firm or the way I  
20 have seen it in some other law firms, you know, by case  
21 number, by the plaintiff's name, and, also -- because  
22 we also had, you know, it wasn't just maybe a civil  
23 litigation matter, it could have been other things. So  
24 I would try and do it that way. Unfortunately, it was  
25 a difficult thing to do because there were so many

1 pieces throughout that I was trying to gather  
2 everything without, you know, missing a beat. So I  
3 actually did it name and case number, and then also by  
4 the state.

5 Q. Okay. And did you set up individual  
6 files for the complaints that you actually found?

7 A. Yes.

8 Q. Did you set up an individual file for the  
9 Powers files -- case?

10 A. Yes.

11 Q. Did you put a copy of the complaint in  
12 that file?

13 A. I believe so, yes.

14 Q. Do you recall what other documents you  
15 put in the Powers file other than the complaint?

16 A. God, there were so many.

17 Q. When you say so many give me --

18 A. Well, I'm just -- I'm just thinking out  
19 loud. There were, you know, the things that were sent  
20 in by your office as well as, you know, like discovery,  
21 the interrogatories, things of that nature that were  
22 also put in the file.

23 Q. Okay. Did you try to put them in the  
24 file in chronological order?

25 A. I tried, yes.

1 Q. Did you have separate like backers, so to  
2 speak, with correspondence, discovery, disclosures?

3 A. Yes.

4 Q. And did you have a correspondence backer  
5 in that file as well, as far as you recall?

6 A. I believe so. I believe there was one,  
7 yes.

8 Q. Okay. And did any of that correspondence  
9 include correspondence between Taser and its insurance  
10 carrier?

11 A. I don't recall, sir.

12 Q. Okay.

13 A. I truly don't remember.

14 Q. Okay. Now, as you searched in these  
15 various locations for this information that you've been  
16 talking about --

17 A. Yes.

18 Q. -- did you find sometimes just  
19 correspondence from lawyers reporting injuries even  
20 though a formal complaint hadn't been filed?

21 MS. REID-MOORE: Form. Go ahead.

22 THE WITNESS: Go ahead?

23 MS. REID-MOORE: Yes.

24 THE WITNESS: There were a few letters  
25 that I did find and I had asked Doug, you know, did he

1 want me to open a file for these even though we had not  
2 been served anything on them.

3 And I actually just would put them in a  
4 separate file just of, you know, pending matters, that  
5 type of thing.

6 Q. BY MR. DILLINGHAM: Okay. So if I  
7 understand what you did when you were there with  
8 respect to these issues, when you found a formal  
9 complaint that was filed, you would set up a separate  
10 file for that, but if you found just a letter of a  
11 purported injury where a lawsuit hadn't been filed,  
12 then you would take that information and put it in a  
13 single file?

14 A. Yes.

15 MS. REID-MOORE: Object to form.

16 THE WITNESS: I'm sorry.

17 MS. REID-MOORE: That's okay.

18 THE WITNESS: I'm sorry.

19 Q. BY MR. DILLINGHAM: And when did you  
20 start doing that, where you got letters and actually  
21 started putting them in a single file?

22 A. Could you repeat the question for me?  
23 I'm sorry.

24 Q. When did you start maintaining that  
25 single file which would contain letters that you'd

1 received even if a formal complaint hadn't been filed?

2 A. I -- I don't remember when. I mean, it  
3 would have probably been, oh, June, July, sometime  
4 around there. I don't really remember.

5 Q. of 2004?

6 A. Yes.

7 Q. Okay.

8 A. I don't recall an actual date or a time  
9 frame.

10 Q. Okay. Can you give me some idea, to the  
11 best of your recollection, at the time you left  
12 approximately how many different of these types of  
13 letters was maintained in this file that you had  
14 started to create of reports of injury that had not  
15 actually resulted in formal complaints being filed?

16 MS. REID-MOORE: Form.

17 THE WITNESS: I don't know. I would say  
18 maybe, maybe five, maybe more.

19 Q. BY MR. DILLINGHAM: Okay.

20 A. I mean, and that's just an estimate  
21 because I truly don't -- I don't recall.

22 Q. And as I understand your testimony, at  
23 the time you were terminated, you were still looking  
24 for this information?

25 A. That is correct.

1 MS. REID-MOORE: Form.

2 Q. BY MR. DILLINGHAM: Okay. When you began  
3 looking for this information, did you ask anybody at  
4 Taser if they had a formal system in place for the  
5 routing of this information once it came in and where  
6 it wound up, anything like that?

7 MS. REID-MOORE: Object to form.

8 THE WITNESS: Yes. I actually -- you

9 Pam Schreiner depo (AZ) Powers 05-25-05  
10 know, I was -- I had always went to Doug and Rick and  
11 whoever, you know, was in charge, you know, what type  
12 of docketing system they had, or, you know, a filing --  
13 you know, did they have a filing room, did they have  
14 specific things in place.

15 And I told them if they didn't, you know,  
16 to let me do that for them, because to me that's a very  
17 important piece.

18 Q. BY MR. DILLINGHAM: what were you told  
19 about whether or not they had a formal filing system in  
20 place at the time you came?

21 A. I was told that there was nothing there.

22 Q. what about a system in place to date  
23 stamp the receipt of correspondence or information, did  
24 they have anything like that in place?

25 A. No.

Q. Did they ever implement that type of

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1 procedure?

2 A. I actually started doing that myself  
3 towards -- you know, once I got everything -- well, not  
4 everything, but once I started going through the  
5 process, you know, I was trying to do that as documents  
6 came in. And, you know, because to me it's very  
7 important that we know when a document is received,  
8 especially complaints.

9 Q. Did you ever talk to anybody at Taser  
10 about implementing a date stamp type procedure?

11 MS. REID-MOORE: Form.

12 THE WITNESS: Yes. AS a matter of fact,  
13 I, towards the -- towards the end of my career there,  
14 I, you know, said, you know, can we use a Bates system,  
15 can we use something. And this would have been  
16 probably, you know, mid last year to the end of the  
17 year.

18 And I created my own thing where I just  
19 would actually stamp it with a -- just a number of, you  
20 know, like, you know, 001, you know, something just so  
21 we had something started.

22 Q. BY MR. DILLINGHAM: Did you ever actually  
23 ask anybody at Taser, is it okay to establish a  
24 procedure whereby when correspondence or documents come  
25 in, we date stamp them? Did you ever have that

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1 discussion with anybody at Taser?

2 A. I had that discussion with Doug Klint.

3 Q. And what were you told?

4 A. I was just -- said, well, you know, if  
5 you want to do that, that's fine.

6 Q. Okay. Were you a little bit surprised  
7 that they didn't have any sort of a formal procedure in  
8 place for dealing with incoming information?

9 MS. REID-MOORE: Form.

10 THE WITNESS: Yes.

11 Q. BY MR. DILLINGHAM: why?

12 A. well, because in any corporation or  
13 any -- anywhere where I've ever been employed, they've  
14 always had some system in place, where, you know,

15 Pam Schreiner depo (AZ) Powers 05-25-05  
16 certain things were put in certain places. And things  
17 were just not left out in the open for everybody to  
18 find and see. So I was somewhat surprised.

19 Q. Okay. I want to talk to you about the  
20 files that you started maintaining for the complaints.

21 A. Okay.

22 Q. And then I'm going to talk to you about  
23 the single file that you had where you put the various  
24 letters in where a formal file wasn't opened for each  
25 individual matter. Okay?

26 A. Okay.

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1 Q. Let's talk about the files that you  
2 started maintaining for the actual complaints that had  
3 been filed.

4 A. Okay.

5 Q. You told me a little bit about the type  
6 of information that was in there. Where did you keep  
7 those files?

8 A. I actually had a -- I brought in a file  
9 cabinet that I had from home, and I, you know, I said,  
10 you know, I'm bringing it in and I'm going to use it  
11 because we need to put these files somewhere. And I  
12 brought it in from home, and I actually started keeping  
13 all the files in that cabinet.

14 Q. What type of file cabinet was it,  
15 two-drawer, three-drawer --

16 A. It was a four-drawer, four-drawer  
17 lateral.

18 Q. And did you keep that right next to your  
19 desk?

20 A. Yes.

21 Q. Where was your desk in proximity to  
22 Mr. Klint's office?

23 A. Basically it was right in front of his,  
24 within maybe six feet, seven feet.

25 Q. Did he know you kept those files in that

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1 lateral file?

2 A. Yes.

3 Q. What about the single file that you were  
4 telling me about that you maintained on these documents  
5 that you received that were just letters or things like  
6 that where a formal complaint hadn't been filed, where  
7 did you keep that file?

8 A. That was also kept in the same file  
9 cabinet.

10 Q. And did Mr. Klint know you kept that in  
11 the same file cabinet?

12 MS. REID-MOORE: Foundation.

13 THE WITNESS: Yes.

14 Q. BY MR. DILLINGHAM: And how do you know  
15 he knew that?

16 A. I told him it was there.

17 Q. Okay. Did you ever see him periodically,  
18 before you left Taser, go into the file to get any of  
19 that information?

20 A. Yes. And he would periodically, you

21 Pam Schreiner depo (AZ) Powers 05-25-05  
21 know, ask me to get a file for him if he needed to look  
22 at something or, you know, whatever.  
23 Q. Okay. Did you keep other types of files  
24 in these file cabinets other than these litigation  
25 files that you said you started maintaining in this

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1 single file with reports of injuries?  
2 A. As far as in the file cabinet?  
3 Q. Yes.  
4 A. No.  
5 Q. Okay. That was basically -- everything  
6 that was in the file cabinet consisted of this type of  
7 information?  
8 A. There were other things in the file  
9 cabinet that were, you know, Rick Smith's information,  
10 if he -- you know, things on different matters for  
11 Rick Smith that had nothing to do with legal. There  
12 were also things in there for Phil Smith that had  
13 nothing to do with legal.  
14 Q. Anything else in this lateral file that  
15 you've described other than what you've just told me  
16 about?  
17 A. No, sir.  
18 Q. Was this lateral file that you maintained  
19 near your desk, did that basically contain all the  
20 files that you yourself actually worked on?  
21 A. Yes.  
22 Q. And that was good because it made it  
23 convenient for you real close to where you worked?

24 Pam Schreiner depo (AZ) Powers 05-25-05  
A. Yes, sir.  
25 Q. All right. Were you ever asked to gather

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1 any information or to help provide any information in  
2 this case?

3 MS. REID-MOORE: Form.

4 THE WITNESS: In the Sam --

5 Q. BY MR. DILLINGHAM: The Powers case?

6 A. Yes.

7 Q. Okay. Tell me when the first time was  
8 you were asked to gather, generate, produce, whatever  
9 you did, any information in this case.

10 A. It would have been the first week of my  
11 employment.

12 Q. Okay. So sometime in the first week of  
13 March of 2004, maybe the second week?

14 A. Maybe in the second week, yes.

15 Q. Okay. And what were you asked to do?

16 A. I was asked to pull together information  
17 regarding the training demo reports and make copies of  
18 those, and also compile, you know, get some information  
19 together from everyone on safety, things like that,  
20 things that were part of the discovery process and get  
21 those to Renaud Cook.

22 Q. Who asked you to do that?

23 A. Doug Klint.

24 Q. Okay. Let me ask it this way. Would  
25 it be fair to say that he came to you and said, Pam,

1 here's the documents that the plaintiff wants, go get  
2 them and produce them to Renaud Cook?

3 MS. REID-MOORE: Object to form.

4 Q. BY MR. DILLINGHAM: Or words to that  
5 effect?

6 A. Not really.

7 MS. REID-MOORE: Same objection.

8 Q. BY MR. DILLINGHAM: Go ahead.

9 A. Oh, I'm sorry.

10 MS. REID-MOORE: Go ahead. I'm sorry.

11 THE WITNESS: Not -- not really.

12 Q. BY MR. DILLINGHAM: Okay. Explain it to  
13 me. Explain what happened.

14 A. Okay. He had given me a -- and I truly  
15 don't remember verbatim the sheets. I know that there  
16 were -- it was either discovery or some sort of a  
17 request from a law firm, you know, the -- I can't think  
18 of the word now. It was a discovery request,  
19 basically.

20 And on there, it stated things that were  
21 needed to go further with the case. You know, the  
22 information was needed for this case. And he  
23 basically, you know, directed me to individuals to  
24 where I might be able to find that information.

25 And once I gathered the information, I

1 was to make a copy for Renaud Cook, both hard copy and  
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2 CD, and keep a copy for us. well, the original was for  
3 us, I'm sorry.

4 Q. Did you do that?

5 A. Yes, I did.

6 Q. Okay. I want to make sure I understand  
7 the physical form of the information that you  
8 generated --

9 A. Uh-huh.

10 Q. -- and the physical form of the items  
11 that you forwarded to Renaud Cook and the physical form  
12 of the items that you kept a copy of for Taser. Okay?

13 A. Okay.

14 Q. Okay. Let me start with that. Did you  
15 produce hard copies of documents that you delivered to  
16 Renaud Cook?

17 A. Yes.

18 Q. Did you keep inside Taser duplicates of  
19 those hard copies?

20 A. Yes.

21 Q. Okay. Did you generate inside Taser a CD  
22 with images of those documents on the CD?

23 A. Yes.

24 MS. REID-MOORE: Form.

25 THE WITNESS: Oh, I'm sorry.

1 A. BY MR. DILLINGHAM: Did you deliver a  
2 copy of that CV to Taser?

3 A. To --

4 MS. REID-MOORE: Form.

5 Q. BY MR. DILLINGHAM: I'm sorry. Did you  
6 deliver a copy of that CD to Renaud Cook?

7 MS. REID-MOORE: Form.

8 THE WITNESS: Yes.

9 Q. BY MR. DILLINGHAM: Did Taser keep a copy  
10 of that CD with the scanned images from the hard copies  
11 of the documents that you produced?

12 A. Yes.

13 MS. REID-MOORE: Form.

14 Q. BY MR. DILLINGHAM: Okay. When you were  
15 given this task, did you have any idea what documents  
16 existed in Taser that fell within the scope of the  
17 items that you were being asked to gather when you were  
18 first given the assignment?

19 A. No.

20 Q. Did Mr. Klint direct you to go to certain  
21 specific people to try to get certain specific  
22 information?

23 A. Yes.

24 Q. What people did he direct you to go see?

25 A. Steve Tuttle, Jami Hill, and, really,

1 those were the two primary people.

2 Q. Okay.

3 A. And then go from there if I needed other  
4 help.

5 Q. Okay. And I assume you followed his  
6 directions and went to both Steve Tuttle and Jami Hill?

7 A. Yes.

8 Q. What information did you get from  
9 Steve Tuttle?

10 A. I was able to get from him press  
11 releases, you know, news articles, the -- some of the  
12 safety reports, things of that nature.

13 Q. When you say some of the safety reports,  
14 what do you mean by that?

15 A. Things that were publicly, you know, put  
16 out for -- on safety of the device.

17 Q. Okay. Anybody -- Anything else that you  
18 can think of that you got from Steve Tuttle?

19 A. Not really. I mean, there was so much  
20 and it was so -- it was actually so long ago I truly  
21 don't remember everything else, you know, everything  
22 that I did get from him. I know that those were  
23 specific things.

24 Q. Okay. What about Jami Hill, what did you  
25 get from her?

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1 A. Jami, I actually went to her to get the  
2 demo report information.

3 Q. And when we talk demo report, we're  
4 talking about the single sheets that have a picture of  
5 a front and back of a human body on it that are  
6 completed by some officers at some time?

7 A. Yes, sir.

8 Q. Okay. Did you get anything else from  
9 her?

10 A. Not at that time, no.

11 Q. We were provided in this case a CD or  
12 DVD on approximately May 5th of 2004 with a series of  
13 various documents that were scanned in which included  
14 some demo reports. Are you aware of that?

15 MS. REID-MOORE: Foundation.

16 THE WITNESS: Yes.

17 MS. REID-MOORE: There are -- just so  
18 that you know, there are two sets. We made one.

19 MR. DILLINGHAM: No, I do understand. I  
20 just want to --

21 MS. REID-MOORE: And then they made one,  
22 so --

23 MR. DILLINGHAM: I'm going to try to get  
24 that clarified.

25 MS. REID-MOORE: Sure. He'll clear it

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1 up.

2 THE WITNESS: Okay.

3 MS. REID-MOORE: He'll clear it up for  
4 you.

5 THE WITNESS: It was just a CD.

6 Q. BY MR. DILLINGHAM: Okay. I'm going to  
7 have you hold this, and hold it up to the camera, and  
8 it's a CD dated May 5th, 2004 with the name Renaud Cook  
9 of it. And can you go a little closer to the camera so  
10 they can get it.

11 THE VIDEOGRAPHER: Okay.

12 Q. BY MR. DILLINGHAM: Okay. Have you ever  
13 seen a copy of that actual CD in that form with Renaud

14 Cook's name on it with the date on it?  
15 A. No.  
16 Q. Okay. You can put it down.  
17 A. Oh, okay. I'm sorry.  
18 Q. Okay. Now, if I understood your  
19 testimony correctly, and I just want to make sure, when  
20 you produced the documents to Renaud Cook, you actually  
21 gave them a CD, but it wasn't this CD; is that right?  
22 MS. REID-MOORE: Form.  
23 THE WITNESS: That is correct.  
24 Q. BY MR. DILLINGHAM: Okay.  
25 MS. REID-MOORE: There's different time

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1 periods.  
2 MR. DILLINGHAM: I'm do --  
3 MS. REID-MOORE: I'm just trying to --  
4 MR. DILLINGHAM: I'm going to get to  
5 that.  
6 MS. REID-MOORE: That's fine.  
7 MR. DILLINGHAM: I know there's a second  
8 one.  
9 Q. BY MR. DILLINGHAM: Now, there was  
10 another CD at a later date that was produced in this  
11 case, and this doesn't have a particular date on it,  
12 but we can get it at a later time. And I want you to  
13 take it, hold that up.  
14 MR. DILLINGHAM: Let me know when you get  
15 it, Brent.  
16 THE VIDEOGRAPHER: Okay.

17 Q. BY MR. DILLINGHAM: Okay. Now, you've  
18 seen a copy of that CD, the one you were just holding  
19 up, right?

20 A. Yes. Well, there was one that I had  
21 created, you know, with that information, but there  
22 were various CD's.

23 Q. Okay. My only question is, with respect  
24 to the first CD that I had you hold up, the one that's  
25 green --

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1 A. Right.

2 Q. -- which is dated May 4th, 2004 --

3 A. Uh-huh.

4 Q. -- before May 4th, 2004, had you actually  
5 physically forwarded a CD to Renaud Cook with the  
6 images on it?

7 MS. REID-MOORE: Object to form.

8 THE WITNESS: I believe so. I don't  
9 remember the dates or anything, but there were, you  
10 know, we had went through a lot of correspondence.

11 Q. BY MR. DILLINGHAM: Okay.

12 MS. REID-MOORE: What was the date of  
13 that one again?

14 MR. DILLINGHAM: May 4th, 2004.

15 MS. REID-MOORE: May 4th, 2004. Okay.

16 Q. BY MR. DILLINGHAM: Okay. Now, before  
17 May 4th, 2004, which is the date of this green CD --

18 A. Yes.

19 Q. -- other than the documents that you got  
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20 from Steve Tuttle, which you've described, and the demo  
21 reports, did you get anything else from them?

22 A. From --

23 Q. Either Steve Tuttle or Jami Hill?

24 A. At some point, and I, honestly, I don't  
25 remember date-wise, so forgive me on that.

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1 Q. Okay.

2 A. At some point there was an actual  
3 worksheet, a spreadsheet in Excel, that would show  
4 the different trainings that were across, you know, the  
5 country, I'm assuming, that would show, you know, any  
6 possible injuries or things of that nature.

7 Q. Okay.

8 A. But, again, I don't remember when that  
9 was.

10 Q. Who did you get that from?

11 A. I actually went to Jami and asked her  
12 about it, because I was told that this was out there  
13 by Doug Klint. And I had went to Jami and asked her if  
14 she knew of this report or this worksheet. And she  
15 basically forwarded that information to me. It was --

16 Q. And how did she --

17 A. It was on her -- it was in Excel and she  
18 had sent it to me via e-mail.

19 Q. And then what you did was pull it up on  
20 your screen and then print it out?

21 A. Yes.

22 Q. And then you sent a hard copy of that

23 document to Renaud Cook?

24 A. I believe I sent a hard copy, but I may  
25 have also had it on CD. I truly don't recall if it was

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1 on CD or not.

2 Q. Okay. Now, I'm going to hand you some  
3 documents.

4 A. Okay.

5 Q. And ask you to hold them up so that the  
6 videographer can --

7 A. See it?

8 Q. -- see it, and then I'm going to ask you  
9 some questions about it. Okay?

10 A. Okay.

11 Q. Could you hold it up so the videographer  
12 can see it.

13 MR. DILLINGHAM: And, Brent, what I'd  
14 like you to do is to focus in on the Bates label on the  
15 bottom. Tell me when you got it.

16 THE VIDEOGRAPHER: Okay.

17 Q. BY MR. DILLINGHAM: Okay.

18 A. Okay.

19 Q. Now, Pam, I will tell you that -- you see  
20 that Bates label on the bottom?

21 A. Yes, sir.

22 Q. That Bates label was on the documents  
23 that are contained on this green disc that were  
24 produced to us on May 5th, 2004.

25 A. Okay.

1 Q. Okay. Now, is this document that begins  
2 with that Bates label, RFP0617, is that the document  
3 that Jami Hill e-mailed to you that you then printed  
4 out and forwarded to Renaud Cook?

5 A. Yes, sir.

6 Q. Okay. And how do you know that?

7 A. I know because this was a document that I  
8 had never seen before up until the time of asking Jami.  
9 And I -- I had asked questions on, you know, the  
10 information of, you know, how it would pertain to  
11 certain things if, you know, if it came out.

12 Q. Okay. Now, at the time you printed that  
13 document out from your screen and you forwarded it to  
14 Renaud Cook, had you personally entered any data into  
15 that database?

16 A. No, sir.

17 Q. We're going to get to this topic a  
18 little bit later, but let me ask you the question now  
19 just so I have it clear.

20 At some later point in time, after you  
21 first generated a copy of this document and forwarded  
22 it to Renaud Cook, did you at some later date enter  
23 data into that spreadsheet?

24 A. Into this spreadsheet, no.

25 Q. Did you enter it into a different

1 spreadsheet that had similar information?

2 A. Yes.

3 Q. Okay. Where did you get that second  
4 spreadsheet that had different information?

5 MS. REID-MOORE: I'm going to object.

6 This is, correct me if I'm wrong, in reference to the  
7 spreadsheet that we reference in our twenty-ninth  
8 supplemental disclosure statement.

9 So to the extent that you get into why it  
10 was created and how it was directed to be created by  
11 Doug Klint, I'm going to have to instruct her not to  
12 answer if we get to that point.

13 MR. DILLINGHAM: Well, wait a second.

14 All I'm asking her is what was the second -- where did  
15 she get the spreadsheet that she entered the data into  
16 that she did enter the data into. That doesn't ask for  
17 any of that stuff.

18 MS. REID-MOORE: Well, I'm just setting  
19 it up, so --

20 MR. DILLINGHAM: Okay.

21 MS. REID-MOORE: We'll see. It may not  
22 get there, and that's fine.

23 Q. BY MR. DILLINGHAM: Okay. This  
24 information that is printed out on that exhibit in  
25 front of you is nothing more than a printout of the

1 screen that Jami Hill e-mailed to you that you printed  
2 out, sent a hard copy up to Renaud Cook, right?

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MS. REID-MOORE: Form, foundation. Go  
4 ahead.  
5 THE WITNESS: Yes, sir.  
6 Q. BY MR. DILLINGHAM: Okay. At some later  
7 date, as I understand it, you did enter information  
8 into a similar type of spreadsheet as the one that's in  
9 front of you, right?  
10 MS. REID-MOORE: Form.  
11 THE WITNESS: Yes.  
12 Q. BY MR. DILLINGHAM: Okay. where -- and  
13 you did that on a computer screen when you entered the  
14 data?  
15 A. Yes.  
16 Q. Where did that spreadsheet form come  
17 from?  
18 A. I created it.  
19 MS. REID-MOORE: Foundation.  
20 Q. BY MR. DILLINGHAM: Go ahead.  
21 A. I created it.  
22 Q. From scratch?  
23 A. Yes.  
24 Q. When did you do that?  
25 A. Oh, I don't remember when. I know it was

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1 probably sometime, you know, in the summer. I just --  
2 I don't recall when.  
3 Q. why did you do it?  
4 MS. REID-MOORE: Form.  
5 THE WITNESS: Is it okay? I'm sorry.

6 MS. REID-MOORE: Go ahead. We'll see  
7 where it goes.

8 THE WITNESS: I was asked to create it.

9 Q. BY MR. DILLINGHAM: By whom?

10 A. By Doug Klint.

11 Q. Okay. I'm going to get back to that  
12 topic a little bit later.

13 A. Okay.

14 Q. But I'm going to try to take you back to  
15 the time frame when you were gathering the documents  
16 that were produced that were on this green CD that you  
17 held up a few minutes ago. Okay?

18 A. Yes, sir.

19 Q. All right. You said you got some demo  
20 reports from Jami Hill; is that right?

21 A. Yes, sir.

22 Q. Now, these demo reports, how did you  
23 physically get them? Did you get hard copies? Were  
24 they e-mailed to you on -- in the computer system? How  
25 did you physically get them?

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1 A. There were actually two separates areas  
2 that they were in. One was an actual hard copy that  
3 they had from -- you know, that were given from  
4 training classes that were sent in by the agencies or  
5 somehow Jami was able to obtain them from these  
6 training classes. Then there was another form of demo  
7 report that was actually online.

8 And I don't know. They were actually in